

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

This Document Relates To:

*All Actions*

Hon. Robert. B. Kugler

Civ. No. 19-2875 (RBK/JS)

**CERTIFICATION OF  
SCHNEUR Z. KASS**

SCHNEUR Z. KASS, being of full age, certifies as follows:

1. I am a partner with the law firm of Rivero Mestre, LLP and serve as counsel for MSPRC. I make this certification based on personal knowledge and in support of MSPRC's Brief on Discovery Issues as Ordered by the Court on October 6, 2022.

2. Attached as Exhibit A is a true and accurate copy of the declaration of Brandon Riff.

3. Attached as Exhibit B is a true and accurate copy of the declaration of Tiffanie Mrakovich.

4. Attached as Exhibit C is a true and accurate copy of the 2018 bid data dictionary, obtained from the Centers for Medicare and Medicaid Service's website at: <https://www.cms.gov/files/zip/bpt2018-data.zip>.

Dated: October 20, 2022

By: /s/ Schneur Z. Kass  
Schneur Z. Kass

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of October 2022, a true and correct copy of the foregoing was filed and served on all counsel of record by the Court's CM/ECF system.

/s/ Jorge A. Mestre  
Jorge A. Mestre